

Torres, Francine

From: Glenn.Fisher@oregonstate.edu%inter2 [Glenn.Fisher@oregonstate.edu] on behalf of Glenn.Fisher@oregonstate.edu
Sent: Friday, February 18, 2005 1:20 PM
To: Torres, Francine
Cc: cam@neudorff.ca%inter2
Subject: ferric phosphate
Attachments: ATTACHMENT.TXT

Ms Francine Torres
National Organic Program
USDA-AMS-tmp-nop
1400 Independence Ave., SW
Rm 4008-So, AG Stop 0268
Washington DC 20250-0200

Dear Ms Torres,

I am an extension entomologist with Oregon State University and have been involved with developing methods to manage slugs in agricultural settings for the last 15 years. Gray garden slug, *Deroceras reticulatum*, Marsh field slug, *Deroceras lavae* and *Arion* spp., are often our limiting factor in the production of many of our vegetable and field crops. This is true whether farmers are organic or conventional as determined by farming practices. I have evaluated many commercial formulations of molluscidal baits in the last decade. I have also observed the small scale use of copper bands, crushed aggregate and nut shells such as hazelnuts and can honestly say that longevity of repellency is ephemeral at best (a few days to a week or two and only when the copper bands are polished and the sharp shells or aggregates are replenished with regularity).

Farm scale agriculture production in western OR and WA really does require a method of slug management that provides substantive protection from damage by slugs. The iron phosphate bait "Sluggo" has provided control statistically comparable to metaldehyde baits in our field trials. The product truly offers an affordable and economic slug control option to other baits unacceptable to the organic community.

You may wish to contact some of our certified organic producers in western WA and OR, Oregon Tilth, Stahlbush Island Farms and even some of our commercial fertilizer and pesticide distributors such as Western farm service in Tangent OR for information as to the severity of slug problems, difficulty in controlling them and the value of ferric phosphate for control.

Thank you for the opportunity to address this situation. Please call or email if I can clarify any points relative to slug management.

Sincerely,

Glenn Fisher
Professor and Extension Entomologist

2/22/2005